

Buchanan Ingersoll & Rooney PC
Attorneys & Government Relations Professionals

Christopher J. Dalton
973 424 5614
christopher.dalton@bipc.com

550 Broad Street, Suite 810
Newark, NJ 07102-4582
T 973 273 9800
F 973 273 9430
www.buchananingersoll.com

April 24, 2017

Via CM/ECF Only

Hon. Cathy L. Waldor, U.S.M.J.
United States District Court
For the District of New Jersey
Martin Luther King Jr. Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: Spellman v. Express Dynamics, LLC
Case No. 2:15-cv-3257-WHW-CLW

Dear Judge Waldor:

We represent Plaintiff Raymond Spellman. During the April 19, 2017 telephonic discovery conference, the Court clarified its position on whether Mr. Spellman could require WorkXpress's FRCP 30(b)(6) witness to testify as to Topic #15: "The facts related to WorkXpress's payment/billing/invoicing arrangements made with its customers." A question was then raised by Mr. Spellman's counsel as to whether that clarification as to Topic #15 also precluded inquiry into WorkXpress's relationships with its customers other than payment/billing/invoicing arrangements.

After reviewing this issue with Mr. Spellman, he has decided not to inquire into WorkXpress's relationships with its customers. Mr. Spellman nonetheless thanks this Court for the opportunity to present his position.

Respectfully,

s/Christopher J. Dalton

Christopher J. Dalton

cc: Amanda J. Lavis, Esq. (by CM/ECF)